

MARGARET A. MCLEATCHIE, Nevada Bar No. 10931  
LEO S. WOLPERT, Nevada Bar No. 12658  
**MCLEATCHIE LAW**  
602 South Tenth Street  
Las Vegas, Nevada 89101  
Telephone: (702) 728-5300; Fax: (702) 425-8220  
Email: Efile@nvlitigation.com  
*Counsel for Plaintiff Jason Mathis*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JASON MATHIS, an individual,  
Plaintiff

vs.

JACOB HOLGUIN, an individual; SAM  
QADERI, an individual; INGRID  
TRASCAN, an individual; CAREN QUIBA,  
an individual and DOE CORRECTIONAL  
OFFICER 5,

Defendants

Case. No.: 2:20-cv-02171-CDS-MDC

**STIPULATION AND ORDER TO  
STAY PROCEEDINGS PENDING  
SETTLEMENT DISCUSSIONS  
SECOND REQUEST**

[ECF No. 73]

Plaintiff Jason Mathis, by and through his counsel of record, McLetchie Law, and Defendants Jacob Holguin, Sam Qaderi, Ingrid Traskan, and Caren Quiba, by and through his counsel, Aaron D. Ford, Nevada Attorney General, Leo T. Hendges, Senior Deputy Attorney General, and Victoria C. Corey, Deputy Attorney General of the State of Nevada, hereby stipulate and agree to the following:

1. On September 30, 2024, this Court granted the Parties' previous Stipulation and Order staying this matter for 14 days so the parties could discuss settlement without incurring the time and expense of work during settlement discussions. (ECF No. 72.)
2. Mr. Mathis' counsel relayed a settlement demand to Defendants' counsel on October 11, 2024.
3. Defendants are in the process of analyzing this demand and preparing a counteroffer.

4. The Parties agree that all deadlines in this matter be stayed for another fourteen (14) day period.
5. Accordingly, the Parties hereby agree and request the Court to enter a stay of all deadlines in the instant case.
6. Should the Parties not reach a settlement, Plaintiff's Opposition to Defendants' pending Motion for Summary Judgment (ECF No. 66) shall be due within five (5) days of the expiration of the instant stay.
7. This is the Parties' second request for a stay of deadlines in this matter.
8. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate in the exchange of information as needed to facilitate settlement.
9. The Parties both submit that the instant stipulation is being offered in good faith and not for the purpose of delay.

**IT IS SO STIPULATED.**

DATED this 14<sup>th</sup> day of October, 2024.

DATED this 14<sup>th</sup> day of October, 2024.

**MCLETCHE LAW**

**STATE OF NEVADA OFFICE OF THE ATTORNEY GENERAL**

/s/ Leo S. Wolpert  
Margaret A. McLetchie, NBN 10931  
Leo S. Wolpert, NBN 12658  
602 South Tenth Street  
Las Vegas, Nevada 89101  
*Counsel for Plaintiff Jason Mathis*

/s/ Victoria C. Corey  
Leo T. Hendges, NBN 16034  
Senior Deputy Attorney General  
Victoria C. Corey NBN, 16364  
Deputy Attorney General  
555 E. Washington Ave., Suite 3900  
Las Vegas, NV 89101  
*Counsel for Defendants*

**ORDER**

Based on the parties' stipulation, the request to extend the stay is approved, nunc pro tunc. The stay is extend to October 24, 2024. No further extensions will be granted. The stay will automatically lift on October 24, 2024. If a settlement is not reached, plaintiff's opposition to the motion for summary judgment is due on October 29, 2024.

Dated: October 21, 2024

  
UNITED STATES DISTRICT JUDGE